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*People / Places / Plans / Future*

February 11, 2011

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Commissioner Mark Sylvia  
Massachusetts Department of Energy Resources  
100 Cambridge Street  
Boston, MA 02114

RE: Building Energy Asset Labeling Program White Paper

Dear Commissioner Sylvia:

Thank you for the opportunity to comment on the pilot program outlined in the Building Energy Asset Labeling Program. MASCO is a non-profit organization that provides services to 23 institutions in the Longwood Medical and Academic Area (LMA) of Boston. Our work includes area planning, traffic and access improvements and development assistance.

MASCO is pleased to see the State taking important steps forward to address greenhouse gas reduction through the building sector which is responsible for 40% or more of statewide greenhouse gas emissions. Because building asset rating programs are still new in the United States, this pilot program is a good mechanism to gain information and knowledge on the opportunities and impediments to stimulation of additional energy conservation investment by property owners of office buildings and multifamily buildings. We support the pilot program as a useful learning tool but caution against moving prematurely into mandatory asset rating programs.

We strongly recommend that the State take into account information still under development such as: 1) ASHRAE protocols for a national asset rating system (Building EQ); and, 2) future DOE National Building Rating Program asset and operational rating tools. This and other information as well as the results of the pilot program should be used to advance the thinking and the dialogue among policy makers and building owners of all types of buildings in formulating subsequent programs. For example, more comparative benchmarking data for research and mixed use buildings like those found on academic and medical campuses is necessary for future development of asset rating programs, beyond office and multifamily residential, and which has so far been difficult to obtain.

In addition, we feel strongly that the following points need to be addressed during the pilot phase prior to consideration of moving to future phases:

- Energy modeling must be consistent in order to provide valid comparative data and ensure a fair rating. Even though COMNET recently developed new guidelines to further standardization of energy modeling, it is not yet clear how well that translates into practice. To guarantee fairness and consistency, an independent third party system may need to be developed either to review all models before assigning ratings or to prequalify a group of specifically trained modelers/assessors.
- An important outcome of the pilot program will be the identification of issues and a plan for their evaluation, including identification of appropriate benchmarking for other building types. These have to be carefully selected to ensure that those buildings, which are in part or fully designed for uses that tend to have high energy requirements (such as research and hospital buildings or academic mixed used campuses), are rated with comparable buildings and on a different scale than building types that generally have lower energy needs (such as office or multi-family residential).
- Further consideration should be made on how to gain building owner participation through mitigation of implementation costs by prioritization of long-range utility or other partnerships to reduce assessment costs; how to develop an adequate and skilled audit force to ensure availability, consistency and quality of the auditors; and amplification of the incentive grant or loan funding available to building owners to maximize participation.
- The establishment of a fixed energy target, based on building type or function, will be a critical step in the rating process to ensure that building ratings are pegged to like buildings rather than a pool of mixed building types. While there are several viable benchmarking tools available for commercial buildings we would like to reemphasize that the application of any proposed benchmark needs to be appropriate for Massachusetts and for the building types.

The pilot program and subsequent data gained from other efforts underway at the Federal level will yield useful information on shaping any future programs. It was a pleasure to serve on this task force and we would welcome the opportunity to continue to be involved in this initiative going forward.

Sincerely,



Sarah J. Hamilton  
Vice President,  
Area Planning and Development



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